ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of:	)	
	)	
Amendment of Section 73.202(b),	)	
Table of Allotments,	)	MB Docket No. _____
FM Broadcast Stations.	)	RM-_____
(Clinton and Mayfield, Kentucky)	)	

To: Office of Secretary
Attn: Chief, Audio Division
Media Bureau

SUPPLEMENT TO PETITION FOR RULEMAKING

Bristol Broadcasting Company, Inc. ("Bristol"), licensee of WLLE(FM), Channel 271C3, Clinton, Kentucky, WQQR(FM), Channel 234C2, Mayfield, Kentucky, and WLIE-FM, Channel 232A, Golconda, Illinois, by its undersigned attorneys and pursuant to Sections 1.401 and 1.420(g) of the Commission's rules, hereby supplements its pending Petition for Rulemaking to amend the FM Table of Allotments to (a) substitute Channel 234C2 for Channel 271C3 at Clinton, Kentucky, and modify the license of WLLE(FM) to specify operation on Channel 234C2; and (b) substitute Channel 271C2 for Channel 234C2 at Mayfield, Kentucky, and modify the license of WQQR(FM) to specify operation on Channel 271C2.

DISCUSSION

On June 17, 2004, Bristol submitted its Petition for Rulemaking seeking to exchange the channel allotments for stations WLLE(FM) and WQQR(FM). This would eliminate the shortspacing of 1.33 kilometers that now exists between the facilities of the two stations, and would allow WLLE(FM) to upgrade from Class C3 to C2 and thus provide an improved broadcast service to the public.

Studies submitted with the Petition for Rulemaking showed that Channel 271C2 could be allocated to Mayfield, Kentucky, at the reference coordinates specified in the Petition consistent with all the minimum distance separation requirements of the Commission, and provide adequate "city-grade" 70 dBu coverage to the entirety of Mayfield.

A spacing study for the proposed allotment of Channel 234C2 at Clinton, Kentucky, revealed that adequate spacing consistent with the Commission's minimum distance separation requirements exists toward all present and proposed allotments and assignments except WLIE-FM, Channel 232A, Golconda, Illinois. The allotment of Channel 234C2 at the reference coordinates creates a spacing of 54.3 kilometers toward WLIE-FM, while spacing of 55 kilometers is required. Consequently, the allotment of Channel 234C2 as proposed would create a prohibited shortspacing of 0.7 kilometers to the authorized facilities of WLIE-FM. Bristol proposed to eliminate this shortspacing by relocating the WLIE-FM transmitter/antenna to the extent necessary to comply with Section 73.207 of the Commission's rules. As WLIE-FM is licensed to Bristol, no third-party consent to the relocation of the WLIE-FM transmitter is required.

Bristol showed in its Petition for Rulemaking that a large area with many potential sites exists for the relocation of the WLIE-FM transmitter, but did not specify a specific set of coordinates for such a transmitter site. The purpose of this Supplement is to supply specific coordinates for a proposed WLIE-FM transmitter location that would be fully spaced to the proposed WLLE(FM) allotment coordinates. As more fully discussed in the attached Engineering Addendum, Bristol has determined that the following coordinates are available as a transmitter site for WLIE-FM and will permit all spacing requirements to be met:

37° 14' 18" North Latitude
88° 29' 40" West Longitude

Bristol respectfully requests that the Commission accept these coordinates for the purposes of its studies with respect to the pending Petition for Rulemaking.

If WLIE-FM is relocated to the specified coordinates, all spacing requirements will be met. WLIE-FM will be able to provide the requisite 70 dBu "city grade" signal to all of Golconda, Illinois, its city of license. There are no terrain obstructions that would prevent adequate service to Golconda. Bristol commits that, should the Commission adopt the Petition, Bristol will promptly prepare and file an application seeking a construction permit to relocate the transmitter facilities of WLIE-FM to accommodate the spacing requirements relative to Station WLLE(FM) and upon grant of a construction permit, will work diligently to construct the new relocated facilities.

CONCLUSION

Bristol Broadcasting Company, Inc. requests that the Commission accept this Supplement to its pending Petition for Rulemaking so as to specify specific coordinates for a transmitter site for WLIE-FM that will eliminate any question of short-spacing to the facilities specified in the Petition for Rulemaking. Ultimately, the Table of FM Allotments specified in Section 73.202(b) of the Commission's rules should be amended to (a) move the allotment of Channel 234C2 from Mayfield to Clinton, Kentucky, and (b) move the allotment of Channel 271C3 from Clinton to Mayfield, Kentucky, upgrade the allotment of Channel 271 at Mayfield from Class C3 to Class C2, and modify the licenses of WQQR(FM) and WLLE(FM) accordingly.

Respectfully submitted,

Bristol Broadcasting Company, Inc.

By: Veronica D. McLaughlin Tippett
Clifford M. Harrington
Veronica D. McLaughlin Tippett

Its Attorneys

Shaw Pittman LLP
2300 N Street, N.W.
Washington, DC 20037
(202) 663-8000

Dated: March 8, 2005

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Bristol Broadcasting Company, Inc.
Clinton and Mayfield, Kentucky

Engineering Addendum

This Engineering Addendum to a Petition for Rulemaking filed by Bristol Broadcasting Company, Inc., licensee of both WLLE(FM) (FCC Facility ID # 56556) at Clinton, Kentucky, and WQQR(FM) (FCC Facility ID # 71613) at Mayfield, Kentucky, seeking to *swap* the allotments at Clinton and Mayfield, Kentucky, one for the other, in order to allow adequate spacing for WLLE(FM) to be upgraded from a Class C3 to a Class C2 facility; was prepared to show an actually available site for the relocation of Station WLIE-FM at Golconda, Illinois, to provide adequate spacing for the allotment of Channel 234C2 at Clinton, Kentucky, as proposed in the Petition.

The geographic coordinates for the available site to which the antenna of Station WLIE-FM can be relocated are:

37^0 14' 18" North Latitude
88^0 29' 40" West Longitude

The owner of the property at this site, James F. Walker of Golconda, Illinois (Telephone number 618-683-2811), has been contacted by Bristol Broadcasting Company, Inc., and has indicated a willingness to negotiate a lease of the property for use as a tower site.

Included herewith as Charts A, B, and C are a channel spacing study demonstrating that adequate spacing for the relocation of WLIE-FM to the available site exists toward all present and proposed facilities, a chart of the terrain elevations along a radial drawn from the available antenna site through the principal city to show the absence of any major terrain obstructions, and a plot of the 70 dBu contour of a Class A station operating at 6 kilowatts and a radiation center HAAT of 100 meters at the available site that clearly shows such a facility would provide "city grade" coverage to the entirety of Golconda, Illinois.

As evidenced by the associated Charts A, B, and C, it is my belief that WLIE-FM could be relocated to the available site at the geographic coordinates shown above consistent will all the rules of the Commission.

I certify that I have personally prepared this Engineering Addendum along with the associated charts and that they are accurate and true to the best of my knowledge, information, and belief.

Roger Bouldin
Consulting Engineer
March 1, 2005

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Addendum Chart A

Channel Spacing Study – WLIE-FM – Channel 232A – Golconda, Illinois

PARAMETERS

Channel 232A
37^0 14' 18" North Latitude
88^0 29' 40" West Longitude

Station	Location	Channel	Class	Bearing	Distance	Required	Margin	OK/Short
WQQR	Clinton	234	C2	196.1	54.77	55	-.23	OK[1]
WMIX	Mount Vernon	231	B	343.5	131.19	113	18.19	OK
WQQR	Mayfield	234	C2	194.5	54.14	55	-.86	Short[2]
WEGI	Oak Grove	232	A	124.8	115.43	115	.43	OK
WLSQ	Dyer	232	A	204.3	138.14	115	22.14	OK
WLZK	Paris	231	C3	170.0	104.16	89	15.16	OK
	Smith Mills	233	A	39.2	79.42	72	7.42	OK

A study of all the present and proposed allotments and assignments on Channel 232, on the three immediately upper adjacent channels, the three immediately lower adjacent channels, and on the two IF channels removed 10.8 mHz and 10.6 mHz respectively from 94.3 mHz (Channel 232) was made using the spacing criteria given in 47 C.F.R. Section 73.207 of the FCC Rules. The results of that study are shown above. For the sake of clarity, only allotments or assignments with a spacing margin less than 30 kilometers were shown on the chart above.

[1]WQQR at the reference coordinates for the allotment of Channel 234C2 at Clinton, Kentucky as proposed by the instant Petition.

[2]WQQR at the currently licensed location.

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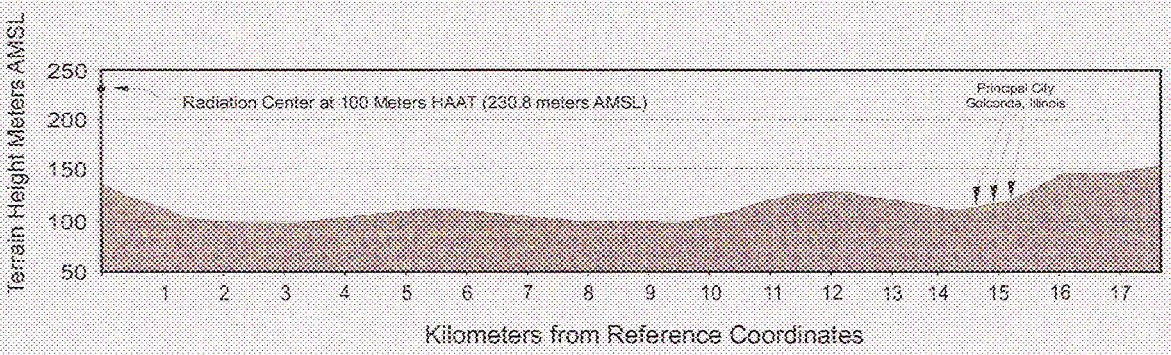
Addendum - Chart B

Principal City Radial Terrain Graph - WLIE-FM - Golconda, Illinois

Terrain Along Principal City Radial



Principal City Terrain Profile

Terrain elevations along a radial drawn from the coordinates (37° 14' 18" N - 88° 29' 40" W) of a site that is available for the relocation of the WLIE-FM tower/transmitter facility to provide adequate spacing for the for the allotment of Channel 234C2 at Clinton, Kentucky, through Golconda, Illinois (the city of license of WLIE-FM),were taken and plotted on the graph above. It is clear that no major terrain obstacles exist between this available location and the principal city.

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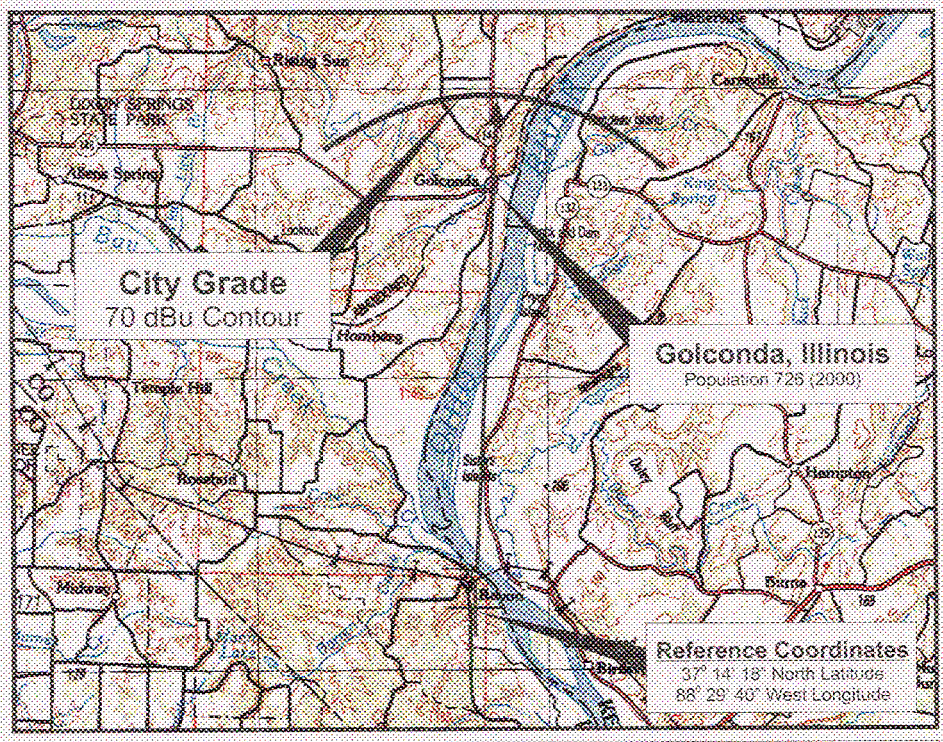
Addendum Chart C

Principal City Contour - WLIE-FM at available relocation site



Principal City Contour

This exhibit was prepared to show the *principal city* (70 dBu) contour for a Class A facility for WLIE-FM operating from the coordinates of a site available for the relocation of the antenna/transmitter facility. Clearly, the 70 dBu contour extends well beyond the corporate limits of Golconda, Illinois.

Terrain Data

Radiation Center - 100 Meters HAAT

Azimuth	Height	HAAT	70 dBu (km)
0°	114.1	116.7	17.7
45°	153.2	77.7	14.4
90°	153.2	77.6	14.4
135°	104.7	126.1	18.7
18°	118.0	112.8	17.2
225°	127.1	103.7	16.1
2700°	144.9	85.9	14.9
315°	131.3	99.5	15.8

BOULDIN
ENGINEERING
410 West Locust Street #1, Johnson City, TN 37604